



**Submission on publicly notified proposal for Christchurch Replacement District Plan
– Memorial Business Park Plan Change**

*Clause 6 of Schedule 1, Canterbury Earthquake (Christchurch Replacement District Plan)
Order 2014*

To Christchurch City Council

By email: dpreview@ccc.govt.nz

Name of submitter: Christchurch International Airport Limited (*CIAL*)

This is a submission on the **Christchurch Replacement District Plan** (*proposed District Plan*) – proposed Memorial Business Park Plan Change (*proposed MBPPC*)

- 1 CIAL could not gain an advantage in trade competition through this submission
- 2 CIAL wishes to be heard in opposition to this submission
- 3 This submission is divided between:
 - 3.1 Part A: General reasons for submission, which sets out the background to CIAL and its interest in the proposed MBPPC; and
 - 3.2 Part B: Specific submission, which sets out CIAL's submission on specific parts of the proposed MBPPC.
- 4 Both Part A and Part B form part of CIAL's submission on the proposed MBPPC – and neither should be read as limiting the other. This submission should also be read in the context of CIAL's own separate submissions and further submissions on the proposed District Plan Review (*pDPR*).
- 5 If others make a similar submission, CIAL will consider presenting a joint case with them at a hearing.
- 6 **Signed** for and on behalf of Christchurch International Airport Limited by its solicitors and authorised agents Chapman Tripp:

Jo Appleyard / Ben Williams
Partner / Senior Associate
30 January 2015

Address for service of submitter:

Christchurch International Airport Ltd
C/- Jo Appleyard / Ben Williams
Chapman Tripp
PO Box 2510
Upper Riccarton
Christchurch 8140

Phone: +64 3 353 4130

Fax: +64 3 365 4587

Email address: ben.williams@chapmantripp.com

PART A: GENERAL REASONS FOR SUBMISSION

- 8 Christchurch International Airport is a critical piece of significant national and regional infrastructure, which must be both provided for, and protected, with an appropriate planning framework.
- 9 This recognition already forms part of *inter alia* the operative Christchurch City Plan, the Canterbury Regional Policy Statement (RPS) and has been previously recognised on a number of occasions by the Environment Court, the High Court and other judicial authorities.
- 10 CIAL's presence and significance includes:
- 10.1 the employment of some 6,000 people at the airport, equivalent to more than 5,000 full-time equivalent staff (2012);
 - 10.2 around 5.7 million passengers travelling through the Airport (in the 2013/2014 financial year);
 - 10.3 economic analyses indicating that the Airport generates \$2.1 billion or 4.4% of South Island GDP (2012) as well as accounting for some 6.1% of employment in the South Island. For the Canterbury Region, this economic analysis has found that the Airport generates \$1.8 billion or 7.1% of the Canterbury Region's GDP (2012) as well as accounting for some 9.7% of employment in the region; and
 - 10.4 following completion of commercial property development and the new integrated terminal, CIAL's assets total over \$1 billion.
- 11 The Airport has a competitive edge over other airports in New Zealand, Australia and the world as it operates uncurfewed and unrestricted as to the types of aircraft using it. The ability of the airport to continue to operate 24 hours a day, 365 days of the year without restriction is integral to the future economic and social well-being of people in the three local authority districts in the region, the South Island and nationally.
- 12 The efficient use and development of the Airport as a significant physical regional infrastructure resource is identified in the RPS, and in particular - both Chapter 5 (Land Use and Infrastructure) and Chapter 6 (Recovery and Rebuilding of Greater Christchurch).
- 12.1 Chapter 5 includes a number of provisions that recognise the importance of regionally significant infrastructure to the community's economic wellbeing, social wellbeing, health and safety (and the need to provide for its establishment, retention and enhancement, as appropriate); and
 - 12.2 Chapter 6 of the RPS also contains a number of provisions that more directly reference the Christchurch International Airport and its operations. The chapter was inserted by the Minister for Canterbury Earthquake Recovery under section 27 of the Canterbury Earthquake Recovery Act 2011. Of relevance to this submission, Policy 6.3.5(4) provides for "*avoid[ing] noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport*", and (5) "*Manag[ing] the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and*

effective, provision, operation, maintenance or upgrade of strategic infrastructure.”

- 13 Overall, CIAL is aware of the value the airport has in terms of its significance as a physical regional infrastructural resource – and its participation in resource consent proposals and plan change proposals (such as the proposed MBPPC) is consistent with that approach.
- 14 At the time of preparing this submission (and to ensure the airport can continue to develop efficiently and efficiently), it is also noted that CIAL is undergoing a tendering process to update the current CIAL 2006 Masterplan and to create a new Terminal Precinct Plan. These documents will be facilitated by the relevant Regional and District planning instruments and will guide the development of the airport (while balancing environmental impacts) over the next 20 years.
- 15 It is critical that the final provisions of the proposed MBPPC are consistent with the wider planning framework and the ongoing provision for, and protection of, Christchurch International Airport.

PART B - SPECIFIC SUBMISSION POINTS

- 16 Due to the nature and structure of the proposed MBPPC provisions, Part B is structured on the basis of ‘issues’ of concern to CIAL (with reference to the relevant provisions where appropriate) – rather than a ‘provision by provision’ submission.

Issue	Discussion	Relief sought
Definitions	<p>The proposed MBPPC relies on a number of definitions that are proposed as a part of the wider proposed District Plan. In many instances the final form of these definitions will be critical to the application of the final plan provisions.</p> <p>Of perhaps the most importance is the definition of ‘sensitive activities’ and its various components (residential, education, guest accommodation and health care activities). CIAL request these definitions from the proposed District Plan (as amended by CIAL’s submission and further submissions) are considered as part of this plan change.</p> <p>For ease of reference the amendments sought by CIAL to the definitions in the proposed District Plan are set out in Annexure 1. These should be read as forming part of this submission on the proposed MBPPC.</p>	<p>Alignment with the definitions notified as part of the District Plan review process (as amended by CIAL’s submissions and further submissions).</p>
Noise sensitive activities	<p>As set out in Part A of this submission, the RPS seeks to avoid noise sensitive activities within the 50 Ldn dBA air noise contour.</p> <p>Rule 16.4.5.1.5 NC3 provides for ‘sensitive activities’¹ inside the 50 Ldn dBA noise contour as a non-complying activity. CIAL supports continuing reference being made to non-complying activity status for sensitive activities (subject to the final definition of sensitive activities as set out elsewhere in this</p>	<p>Support continuing use of non-complying activity status in NC3.</p> <p>CIAL also seeks that the nature of guest accommodation be defined such that it is only ‘non-sensitive activity’ guest accommodation (if any) that is provided for in P14. In the alternative, guest accommodation should be determined as a non-complying activity under NC3.</p> <p>The use of insulation is supported, but it should not be used as a means to justify a different approach to sensitive</p>

¹ Noting that the pDPR includes a definition relating to ‘sensitive activities’ that groups together activities relating to electricity related assets (not relevant to the CIAL submission) and noise.

Issue	Discussion	Relief sought				
	<p>submission).</p> <p>Rule 16.4.5.1.1 P14 provides for guest accommodation which, CIAL notes is also a sensitive activity (at least some instances) for the purposes of Rule 16.4.5.1.5 NC3.</p> <p>CIAL supports provision being made for acoustic insulation provided it is consistent with that provided elsewhere in the final provisions of the proposed District Plan.</p>	<p>activities in the particular case of guest accommodation.</p> <p>Any insulation should be consistent with that provided elsewhere in the final provisions of proposed District Plan.</p>				
<p>Bird strike / landscaping</p>	<p>CIAL is required to manage and if possible reduce the risk of bird strike risk. It actively works to minimise the threat and incidence of bird strike on its own land and in the wider region.</p> <p>CIAL has already made extensive submissions on the proposed District Plan with regards to bird strike.</p> <p>In this regard, CIAL considers that the management of activities that constitute a bird strike risk is a matter that needs to be applied consistently across all zones. Such a cross-zone control would most appropriately sit within a 'General City Rules' Chapter. Such a Chapter was not proposed as part of the Stage 1 review of the City Plan, however it is considered that a single rule is a more effective method for achieving the policy framework regarding protection of strategic infrastructure than a piecemeal zone-by-zone approach. For the proposed MBPPC, CIAL seeks the deletion of all bird strike/ stormwater basin rules and associated assessment matters from individual zone packages and the subdivision chapter and their replacement with a single consistent and effective rule package that covers all zones.</p> <p>As its secondary and less preferred relief, the proposed rule package should be inserted into every zone</p>	<p>The relief set out is consistent with CIAL's primary sought relief.</p> <p>Add new Activity Standard <i>RD1 Bird strike risk activities</i></p> <table border="1" data-bbox="935 904 1414 1323"> <thead> <tr> <th data-bbox="935 904 1174 1070">Activity</th> <th data-bbox="1179 904 1414 1070">The Council's Discretion shall be limited to the following matters</th> </tr> </thead> <tbody> <tr> <td data-bbox="935 1070 1174 1323"><i>RD'X' Bird strike risk activities within 13 Kilometres of the edge of the Christchurch International Airport runways.</i></td> <td data-bbox="1179 1070 1414 1323"><i>Assessment matter Xxxx Management of bird strike risk on Christchurch International airport operations.</i></td> </tr> </tbody> </table> <p>Add new Built Form Standard with a Restricted Discretionary status:</p> <p><i>Within 13km of the end of Christchurch International Airport runways, there shall be no creation of waterbodies that form a Bird Strike Risk Activity, except for stormwater facilities for the disposal and/or treatment of stormwater. Any stormwater facilities must be designed, operated and managed (including the margins and plantings) to avoid attracting bird species which constitute a hazard to aircraft. The stormwater system shall be certified by a suitably qualified person to the following standards:</i></p> <p>a. <i>The design, operation and management of the stormwater system shall avoid attracting</i></p>	Activity	The Council's Discretion shall be limited to the following matters	<i>RD'X' Bird strike risk activities within 13 Kilometres of the edge of the Christchurch International Airport runways.</i>	<i>Assessment matter Xxxx Management of bird strike risk on Christchurch International airport operations.</i>
Activity	The Council's Discretion shall be limited to the following matters					
<i>RD'X' Bird strike risk activities within 13 Kilometres of the edge of the Christchurch International Airport runways.</i>	<i>Assessment matter Xxxx Management of bird strike risk on Christchurch International airport operations.</i>					

Issue	Discussion	Relief sought
	<p>rules framework within 13km of the runways at Christchurch international Airport Limited.</p> <p>If, provision if made within the specific Memorial Business Park zone, the provisions would need to include:</p> <ul style="list-style-type: none"> • avoiding the creation of bird habitats that could lead to an increase in the populations of those bird species known to be a hazard to safe aircraft operation; • ensuring that the management of all landscape features is such that they do not encourage those species known to be threat to a safe aircraft operation to visit or inhabit the site (therefore, planting should reflect similar species to those included in the CIAL Area 2A Landscape Protocol should be used); • a Bird Management Plan (BMP) being prepared in consultation with CIAL. At a minimum the Plan would ensure that the design and ongoing management of all landscape features associated with the stormwater disposal, planted amenity areas on the site, and general site management minimises the sites attractiveness to all bird species; <p>and</p> <ul style="list-style-type: none"> • that an appropriate contact person onsite be appointed to be responsible and to oversee the BMP. 	<p><i>bird species which constitute a hazard to aircraft;</i></p> <ul style="list-style-type: none"> <i>b. Stormwater infiltration basins are designed to fully drain within 48 hours of the cessation of a 2% AEP storm event;</i> <i>c. Rapid soakage overflow chambers in sufficient numbers and with sufficient capacity to minimise any ponding of stormwater outside of the infiltration basin areas;</i> <i>d. The use of plant species within the basin (including its margins) that are suitable for inundation by stormwater and are not attractive to birds; and</i> <i>e. Basin size and side slope dimensions that are suitable for stormwater management and are not attractive to birds.</i> <p><i>Any application arising from non-compliance with this rule will only require written approval from Christchurch International Airport Limited.</i></p> <p>Add new assessment matters as follows:</p> <ul style="list-style-type: none"> <i>a. The extent to which the proposed bird strike risk activity will be attractive to birdlife that might pose a bird strike risk to the operation of Christchurch International Airport Limited;</i> <i>b. Whether a management plan has been developed that demonstrates there will be ongoing operation and maintenance of the stormwater system or Bird Strike Risk Activity to minimise bird strike risk for the life of the stormwater system or activity, and whether that plan has been developed in consultation with Christchurch International Airport Limited.</i> <p>If, in the alternative, CIAL’s alternative approach is adopted (i.e. by including zone specific provisions within the proposed MBPPC), this could include an express requirement for a bird</p>

Issue	Discussion	Relief sought
		management plan (e.g. <i>inter alia</i> in 16.4.5.2.7 and 16.4.5.3.2) with reference to the matters set out in the <i>Discussion</i> column.
Lighting / glare	<p>The issue of lighting design, and the creation of glare and atmospheric spill, are also of particular interest to CIAL. The primary concern being any potential effect the vision of pilots of aircraft approaching 11/29 (the northwest runway) or effects on the safe and efficient operation of the airport control tower with respect to aircraft in the circuit over Christchurch City.</p> <p>Any lighting scheme should be professionally designed, installed, and controlled to avoid any potential impact on aircraft operations. The proposal should ensure full compliance with the relevant City Plan Glare Rules (below) and wherever practicable use Type 6 luminaires in accordance with Table 2.10 'Classification of Luminaires and Associated Criteria for Control of Glare and Upward Waste Light' of AS/NZS 1158.3.1: 2005 for all exterior lighting (including street lighting).</p> <p>The relevant City Plan provisions include:</p> <ul style="list-style-type: none"> • 2.2.2: Point of measurement – Lux Spill • 2.3.4: Glare Standards – Group 3 Zones • 2.3.5: Effect of illumination on aircraft operation and arterial roads • 2.5 Reasons for Rules 	A new Built Form Standard be included "Lighting and Glare" that includes the standards set out.
Stormwater	Consistent with the concerns set out elsewhere in this submission, CIAL considers the current provisions for surface water management (for	CIAL seeks consistency with the provisions being sought by CIAL through the proposed District Plan review process (including ensuring

Issue	Discussion	Relief sought
	<p>example Rule 16.4.5.1.3 RD4) are inadequate and do not recognise the potential risks of bird strike to CIAL.</p>	<p>infrastructure is available for any development).</p>
Wastewater	<p>The issue of wastewater availability is of particular concern to CIAL. Rule 16.4.5.2.9 states that, until the Riccarton Interceptor Sewer is upgraded, there shall be no discharge of wastewater to the CCC wastewater network. Any activity not complying with this is a non-complying activity.</p> <p>CIAL believe that the provision allowed by this rule, for a non-complying subdivision consent to be lodged and potentially granted, will potentially compromise the provision of services for existing or already proposed activities/developments that are designed to discharge to the same sewer system proposed - - including that from Dakota Park.</p> <p>It is noted that the infrastructure report provided by Memorial Avenue Investments Limited indicates that CCC's sewer upgrades will not be in place until 2019 (with the upgrade of the Riccarton Interceptor).</p>	<p>CIAL seeks either:</p> <ul style="list-style-type: none"> • a stronger policy framework around when a non-complying activity might be appropriate; or • that any activity not complying with Rule 16.4.5.2.9 is a prohibited activity.
Traffic	<p>CIAL note there is no indication of how the adverse traffic effects of development arising from the proposed MBPPC (that are identified in the Transportation Assessment Report prepared for the plan change), could be mitigated.</p> <p>CIAL seeks that the simulation modelling undertaken for the proposed MBPPC be extended to include the signalised intersection of Memorial Avenue / Ron Guthrey Drive / Peter Leeming Drive (on the basis that the critical ability to link this intersection with the adjacent Russley Road traffic signals could be disrupted by the signal phasing and linking adopted to accommodate the very high traffic generation expected</p>	<p>The proposed MBPPC is only approved to the extent that it can be shown that the related traffic effects can be accommodated safely and efficiently and not compromise access to/from Christchurch International Airport.</p> <p>Airport related activities and activities which could attract workers at the airport should not be accommodated on the MAIL site to avoid adverse traffic effects.</p>

Issue	Discussion	Relief sought
	<p>for the MAIL site).</p> <p>CIAL also seeks as part of the hearing process the ability to view the calibration report for the simulation model to better understand the full assessment of traffic effects</p> <p>CIAL is concerned that airport related activities and activities which could attract workers at the airport could be accommodated on the MAIL site and that interacting traffic and pedestrian flows could adversely impact on the safe and efficient performance of the Russley Road and Memorial Avenue intersection.</p> <p>As far as can be ascertained from the transportation assessment report, there is no indication of whether the effect of additional traffic interaction with pedestrians (and cyclists) using the signalised crossings of Russley Road have been taken into account as part of the traffic assessment.</p>	
<p>Runway End Protection Area (REPA)</p>	<p>Rule P15 provides for parking lots within the REPA, however there is no corresponding rule or cross reference to a rule elsewhere restricting buildings within this area (and therefore by default a building within the REPA is a discretionary activity).</p> <p>The ODP also shows the REPA but does not indicate that no additional buildings are placed within the REPA.</p> <p>The operative City Plan prohibits buildings within the REPA area via Rule 6.2 contained in Part 9 of Volume 3. It is unclear at this stage whether a similar chapter will be incorporated into the pDPR. Therefore out of caution CIAL is seeking that this rule be incorporated into the proposal (emphasising that CIAL is seeking consistency in the approach to the REPA across the City</p>	<p>CIAL requests that the red shaded area within the site is controlled through the existing rule provisions (or an equivalent) for the REPA, including:</p> <ul style="list-style-type: none"> • Rule 6.2 Prohibited activity (Volume 3, Part 9); and • Rule 6.3.4 Approach Surfaces <p>CIAL seeks consistency in terms or REPA management across all the REPA areas.</p>

Issue	Discussion	Relief sought
	<p>Plan).</p> <p>For completeness, CIAL notes that it is seeking to designate a portion of the green shaded area located on the north east quadrant of the subject site, which is owned by a third party. This forms part of the separate request by CIAL to rollover the existing Christchurch International Airport designation, with modifications. The final provisions of the rolled over designation are intended to be consistent with the final provisions sought/supported in this submission.</p>	
Office activity	<p>The proposed MBPPC change allows for office development of up to 5000m² across the site. This is inconsistent with the proposed provisions for many other industrial zones in the pDPR.</p> <p>In this regard, it is further noted, for example, that proposed plan change 84 (relating to Christchurch Airport) limits the type and scale of office activities to those which provide for the needs of travellers, workers, visitors within the zone in order to ensure a primary focus on the Central City.</p>	That rules P11 be deleted and offices be made a discretionary activity consistent with other Industrial zones.
Guest accommodation	<p>The issue of guest accommodation has already been addressed, in part, in the discussion of noise sensitive activities.</p> <p>In simple terms, CIAL supports the inclusion of the 50 Ldn dBa airport noise contour but seeks appropriate restrictions on sensitive activities within that contour.</p> <p>The proposed MBPPC proposes a permitted activity (Rule 16.4.5.1.1 P14) for guest accommodation, but at least in some instances guest accommodation will also be a 'sensitive activity' and non-complying within the 50 Ldn dBA contour (Rule</p>	<p>CIAL seeks that the current ambiguity around guest accommodation be removed.</p> <p>To the extent that guest accommodation is a sensitive activity, a permitted activity standard is not appropriate.</p>

Issue	Discussion	Relief sought
	<p>16.4.5.1.5 NC3).</p> <p>In this regard CIAL, is already seeking as part of its pDRP submission amendments to the definition of "guest accommodation":</p> <p><i>means the use of land and/or buildings for transient residential accommodation offered at a tariff, which may involve the sale of alcohol and/or food to in-house guests, and the sale of food, with or without alcohol, to the public. Guest accommodation includes hotels, resorts, motels, motor and tourist lodges, hostels and camping grounds.</i></p> <p>And the reference to the guest accommodation 'exception' as it appears in the definition of sensitive activity:</p> <p><i>b. in relation to noise:</i></p> <p>...</p> <p><i>guest accommodation, except that which is designed, constructed and operated for short term stays and to a standard to mitigate the effects of aircraft noise on occupants within the airport noise contours;</i></p> <p>Without the CIAL-sought amendments set out being made, there is ambiguity/uncertainty as to the application of the pDRP and the MBPPC provisions. However that is not necessarily the end of the ambiguity/uncertainty, noting that 'guest accommodation' is currently defined:</p> <ul style="list-style-type: none"> • as 'travellers accommodation' in the operative City Plan as including 'motels, holiday flats, motor and tourist lodges and hostels'; and • in the replacement District Plan (Phase 1 notified 	

Issue	Discussion	Relief sought
	<p>version), as including motels, motor and tourist lodges, hostels and camping grounds. CIAL has however submitted on this definition, requesting that 'hotels and resorts' be included in the definition. CIAL also supported the Christchurch City Council's own submission to include 'backpackers' in the definition.</p> <p>It therefore appears that the guest accommodation definitions (from either the operative or replacement versions of the plan) do not include hotels, resorts and backpackers. These specific accommodation activities are accordingly (and wrongly) not 'sensitive activities' for the purpose of Rule NC3, nor are they permitted as 'guest accommodation' for the purpose of P14.</p> <p>CIAL seeks clarity in respect to this anomaly particularly if it results in the activity falling to discretionary activity status under Rule 16.4.5.1.4 D3 as any other activity not otherwise provided for in the plan change.</p>	
Retail	<p>CIAL considers the retail provisions in the proposal are inconsistent with other similar provisions in the pDPR.</p> <p>CIAL notes that no other industrial zone has retail activities as a permitted activity. Such activities are fully discretionary.</p> <p>CIAL also notes that the related assessment matters do not consider matters such as traffic.</p>	<p>CIAL seeks that Rule P6 be deleted and that the retail activities be made a discretionary activity consistent with other Industrial zones.</p>
General	<p>The Council recently notified and heard submissions on plan change 84 (which principally relates to activities at Christchurch International</p>	<p>CIAL seeks consistency between the final provisions of plan change 84 and the proposed MBPPC.</p>

Issue	Discussion	Relief sought
	Airport).	

ANNEXURE 1: DEFINITIONS / REASONS FOR SUBMISSION

Section / Definition	Comment	Proposed modification (strike-out , bold and underlined)
'Education activities'	CIAL supports the definition.	No change
Amend definition of 'guest accommodation'	<p>CIAL supports the addition of 'camping grounds' to this definition. CIAL however requests the definition is amended to include 'hotels' and 'resorts'.</p> <p>Guest accommodation is a component of the 'sensitive activities' definition. CIAL considers all new sensitive activities should be avoided under the 50 Ldn dBA air noise contours for Christchurch International Airport. Therefore the definition of guest accommodation should be wide to cover all possible aspects of accommodation used by travellers.</p>	<p>Amend:</p> <p>means the use of land and/or buildings for transient residential accommodation offered at a tariff, which may involve the sale of alcohol and/or food to in-house guests, and the sale of food, with or without alcohol, to the public. Guest accommodation includes hotels, resorts, motels, motor and tourist lodges, hostels and camping grounds.</p>
Amend definition of 'office'	<p>CIAL considers it is appropriate to include reference to 'commercial offices' consistent with the approach taken in operative City Plan. This definition may have implications for the range of offices able to be provided for the in the Special Purpose Airport Zone.</p>	<p>Amend:</p> <p>means any of the following:</p> <ol style="list-style-type: none"> 1. administrative offices where the administration of an organisation, whether trading or non-trading, is conducted and includes bank administration offices; and 2. professional offices where professional services are available and carried out and includes the offices of accountants, solicitors, architects, surveyors, engineers and consultants. 3. <u>commercial office means a business not elsewhere defined as a commercial service where trade (other than that involving the immediate exchange of money for goods or the display or production of goods) is transacted</u>
'Residential activity'	<p>CIAL supports the proposed definition, including the removal of the following from the definition contained in the operative City Plan:</p> <p><i>"the provision of accommodation to a maximum of four travellers at a tariff where at least one permanent resident resides on the site;"</i></p>	No change
Amend definition of 'Residential unit'	<p>'Residential unit' is a component of the 'residential activity' definition. 'Residential activity' is a component of the 'sensitive activities' definition. CIAL considers all new sensitive activities should be avoided under the 50 Ldn dBA air noise contours for Christchurch International Airport unless they are in existing</p>	<p>Amend:</p> <p>means a self-contained building (or group of buildings including accessory buildings) used for a residential activity by one or more persons who form a single household unit. For the purposes of this definition:</p> <ol style="list-style-type: none"> 1. a building used for emergency or refuge accommodation shall be

Section / Definition	Comment	Proposed modification (strike-out , bold and underlined)
	residentially zoned urban areas. CIAL does not consider it to be appropriate to include holiday homes within the definition of residential unit and therefore increase the number of new people (i.e. those using a holiday home) potentially affected by aircraft noise within the noise contours.	<p>deemed to be used by a single household;</p> <p>2. where there is more than one kitchen on a site (other than a kitchen in a family flat) there shall be deemed to be more than one residential unit;</p> <p>3. a residential unit may include no more than one family flat as part of that residential unit, and</p> <p>4. a residential unit may be used as a holiday home provided it does not involve the sale of alcohol, food or other goods.</p>
Amend definition of 'Retail activity'	CIAL considers it is inappropriate to exclude trade suppliers, yard-based suppliers and service stations from the definition of 'retail activity'.	<p>Amend:</p> <p>means the use of land and/or buildings for displaying or offering goods for sale or hire to the public and includes food and beverage outlets, second-hand goods outlets, food courts and commercial mail order or internet-based transactions, It excludes trade suppliers, yard-based suppliers and service stations</p>
Amend definition of 'sensitive activities'	<p>CIAL requests the 'sensitive activities' definition in relation to noise is amended as follows:</p> <ul style="list-style-type: none"> CIAL considers it appropriate to limit education activities to just flight training, trade training or other industry related training facilities that are located in the Special Purpose (Airport) Zone. This approach is consistent with the definition of 'noise sensitive activities' in Chapter 6 of the Regional Policy Statement. 'Retirement village' should be added to the definition given it is a definition for a type of new noise sensitive activity included in the proposed Plan. CIAL considers guest accommodation, if it is to be within the 50 Ldn dBA contour, should be acoustically treated and only be for short term stays. <p>CIAL otherwise supports the 'sensitive activities' definition.</p>	<p>Amend:</p> <p>b. in relation to noise:</p> <p>residential activities, including family flats and any elderly persons' housing units or complex, retirement village, but excluding those in conjunction with rural activities that comply with the rules in the relevant district plans as at 23 August 2008;</p> <p>education activities including pre-schools, but not including flight training, or trade training or other trade and industry related training facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan on land zoned or legally used for commercial or industrial activities;</p> <p>guest accommodation, except that which is designed, constructed and operated for short term stays and to a standard to mitigate the effects of aircraft noise on occupants within the airport noise contours;</p> <p>health care facilities;</p>